

Exhibit 12

M.B. - A Minor 12/16/2014

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
3 JACKSON DIVISION

4 M.B., A MINOR BY AND
5 THROUGH HER NEXT FRIEND,
6 KANWAR SINGH BEDI

PLAINTIFF

7 V. CIVIL ACTION NO. 3:13-CV-00241-CWR-FKB

8 RANKIN COUNTY SCHOOL
9 DISTRICT AND CHARLES
10 FRAZIER INDIVIDUALLY AND
11 IN HIS OFFICIAL CAPACITY
12 AS PRINCIPAL OF NORTHWEST
13 RANKIN HIGH SCHOOL

DEFENDANTS

14 DEPOSITION OF M.B., A MINOR

15 Taken at the instance of the Defendants at Corlew,
16 Munford & Smith, PLLC, 4450 Old Canton Road, Suite
17 111, Jackson, Mississippi, on Tuesday, December 16,
18 2014, beginning at 11:16 a.m.

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M.B. - A Minor 12/16/2014

Page 2

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|----|-------------------------------------|----|
| 1 | INDEX | |
| 2 | Style and Appearances..... | 1 |
| 3 | Index | 3 |
| 4 | Certificate of Deponent | 31 |
| 5 | Certificate of Court Reporter | 32 |
| 6 | EXAMINATIONS | |
| 7 | Examination By Ms. Wall | 4 |
| 8 | Examination By Mr. Harrell | 27 |
| 9 | Examination By Ms. Wall | 29 |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
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M.B. - A Minor 12/16/2014

Page 4

1 M.B., A MINOR,
2 having been first duly sworn, was examined and
3 testified as follows:

4 EXAMINATION BY MS. WALL:

5 Q. Can you state your name for the record?

6 A. Gracie Bedi.

7 Q. And your address?

8 A. Four Glensview Court, Brandon, Mississippi
9 39047.

10 Q. Okay. And you've given a deposition
11 before, right, Gracie?

12 A. Yes, ma'am.

13 Q. And you understand I'm going to be asking
14 you some questions. Freddie Harrell may be asking
15 you some questions. Your attorneys may be asking
16 you some questions. And if you don't understand the
17 question, just tell me, and I'll try to rephrase it.

18 Also, if you remember, she's trying to
19 take down every single thing you're saying, so if
20 you'll answer "yes" or "no."

21 A. Right.

22 Q. You've got that?

23 A. Yes, ma'am.

24 Q. And it's your deposition. If you need a
25 break, tell us --

M.B. - A Minor 12/16/2014

Page 5

1 A. Uh-huh.

2 Q. -- and we'll take a break.

3 A. All right.

4 Q. We're here today about the ACT ceremony
5 when you were a senior in high school.

6 A. Yes.

7 Q. It's a little bit -- you are no longer at
8 Northwest Rankin; is that right?

9 A. No, ma'am.

10 Q. Okay. Where do you go to school now?

11 A. American University in Washington, D.C.

12 Q. Okay. And you graduated?

13 A. May 2014, May 17th.

14 Q. Okay. And this ACT program took place
15 when?

16 A. April 17th, was it? April 17th, I think.

17 Q. Of 2014?

18 A. Yes.

19 Q. Okay. And was this a program that was
20 just for seniors?

21 A. Yes.

22 Q. Okay. So -- but they do it every year?

23 A. Yes.

24 Q. Okay. How did you find out about this
25 program?

1 A. It's advertised very heavily within the
2 school. There are brochures, and teachers announce
3 it.

4 Q. Okay. Do you get a formal invitation?

5 A. No.

6 Q. Okay.

7 A. You're on a list, and that's how they know
8 that you can go.

9 Q. Okay. And it was based on your ACT score,
10 correct?

11 A. Yes.

12 Q. And you had real, real high ACTs, correct?

13 A. Yes, ma'am.

14 Q. And what was that?

15 A. 28 -- 29 was the latter one.

16 Q. Do you remember what the brochures or
17 anything in -- anything specific about how the
18 invitations or the -- how you found out that --

19 A. They simply stated the dates and the
20 reason, who was presenting it, which is the RCSD
21 school district, and attire, which is to be either
22 business or Easter Sunday.

23 Q. Okay. Now, when you said "they," who did
24 you specifically hear it from?

25 A. My senior project teacher, Amelia

1 Perryman.

2 Q. Okay. What is a senior project teacher?

3 A. All seniors are required to do a senior
4 project. It's a year-long project, and the topic
5 changes year by year. This year was our -- based on
6 our careers, our future careers.

7 Q. Okay. Does each student have a different
8 senior topic?

9 A. There are about three to four main senior
10 project teachers --

11 Q. Okay.

12 A. -- that we're distributed amongst.

13 Q. So do you know -- what did she tell you to
14 wear?

15 A. We were told to wear business.

16 Q. Okay.

17 A. Other teachers, to my knowledge, were told
18 to wear Easter Sunday.

19 Q. So would it be -- when we're talking about
20 "other teachers," it would be -- would that
21 information have come from the senior project
22 teachers, or do you know?

23 A. Yes.

24 Q. Okay. So anybody that was invited --
25 correct me if I'm wrong -- anybody that was invited

1 to the awards program would have been instructed
2 through their senior teacher?

3 A. Yes.

4 Q. Okay. And do you know how Amelia would
5 have found out about the ACT or what to tell you
6 or --

7 A. I can only assume she received an e-mail
8 from the principal or the district.

9 Q. Okay.

10 A. I don't know for sure, though.

11 Q. Okay. And about when in the year did you
12 find out that you would be invited?

13 A. I believe it was early spring, the spring
14 semester, but it's something that's been done for
15 years, and I already knew the standard because my
16 brother went through the same thing. And so I knew
17 I'd be invited from the beginning.

18 Q. Okay. And just for seniors?

19 A. Just for seniors.

20 Q. Was it compulsory?

21 A. It was not compulsory.

22 Q. Okay. But somewhere I read that you said
23 you got excused from class?

24 A. Yes, we got excused from class. It was
25 highly expected of you to attend.

1 Q. Okay.

2 A. You could not show up to school and then
3 not attend, but if you showed up for school, you
4 were expected to go.

5 Q. Got you. Now, you got an excuse from your
6 class?

7 A. Yes.

8 Q. Was it this -- back to Ms. Perryman, did
9 she have a specific class she went to --

10 A. Yes.

11 Q. -- or she was your adviser?

12 A. A specific class.

13 Q. Was it during that time period?

14 A. It was during that class as well as
15 another class, which is physics.

16 Q. Oh, wow. Now, how did you get -- it
17 wasn't at Northwest Rankin, correct?

18 A. No, ma'am.

19 Q. Do you know why they would have it at
20 Brandon?

21 A. I'm assuming the larger facilities.

22 Q. Okay. Even though Northwest Rankin has a
23 big --

24 A. We're not that quite big. It's big, but
25 not in comparison.

1 Q. Okay. I've never been to Brandon.

2 A. We're all very jealous of Brandon High
3 School.

4 Q. So how did you -- did they transport
5 everybody that's going? Did you take your own car?

6 A. Yes. We took a school bus --

7 Q. Okay.

8 A. -- multiple school buses.

9 Q. Okay. Did you -- outside guests, were
10 there other people?

11 A. No, parents specifically were not invited.

12 Q. Okay. What about teachers from Northwest
13 Rankin or teachers from the school district or
14 school district employees, who besides the students
15 were there?

16 A. Besides the students?

17 Q. Uh-huh.

18 A. I know Amelia Perryman was there. I'm
19 assuming the other senior project teachers were
20 probably there as well. Probably chaperones as well
21 as just to observe. There were members of the
22 district board who presented themselves, Lynn
23 Weathersby was there. All the principals from the
24 high schools and district were there, including
25 Charles Frazier.

1 I think at one point, Josh Harkins was
2 there. He left early. I can't recall quite when.
3 And then I'm sure there may have been other
4 administrators just watching and helping orchestrate
5 the event, but I couldn't tell you for sure.

6 Q. Okay. So you said there was the teachers,
7 the four teachers. Do you happen to know who the
8 other teachers were besides Perryman?

9 A. I remember there was a Ms. Banks and a
10 Ms. Conner, but those are the three I remember.

11 Q. Got you. And you said some chaperones.
12 Would those be other teachers or --

13 A. Other teachers probably. Again, I can't
14 recall quite faces and names, but other teachers
15 were probably there.

16 Q. But there were other teachers from
17 Northwest Rankin besides just these four teachers?

18 A. Yes.

19 Q. Okay. I got you. And you said that
20 Ms. Perryman is the one that told you what to wear?

21 A. Yes.

22 Q. Do you have any idea who told people to
23 wear, you say, Easter or Sunday School attire?

24 A. Yes. It was actually kind of a thing of
25 contention. There was a lot of discussion about

1 which one to wear, because business, as you know, is
2 different than Easter Sunday. And from what I can
3 tell, the other senior project teachers told the
4 other students because we were kind of discussing
5 what we should wear in comparison to each other.

6 And so some teachers told Easter Sunday,
7 some were told business. I think Amelia is the one
8 -- or Ms. Perryman, rather, is the one -- the only
9 one who did business, as far as I know. And I think
10 the overall consensus was Easter Sunday, because
11 most everyone showed up in Easter Sunday after a
12 discussion.

13 Q. Okay. Who did you have these
14 conversations with about the attire, anybody in
15 particular?

16 A. Fellow classmates. I remember I had a
17 conversation with Faith Ambrose. I believe I
18 mentioned her before. Aside from that, people, you
19 know, gather in clumps in the cafeteria and just
20 discuss. I couldn't tell you any particular names.

21 Q. Okay. It was just kind of a thread that
22 was running through the week?

23 A. Exactly, the grapevine, you know.

24 Q. Right. Now, as to the program, do you
25 have any idea who was in charge of selecting the

1 speakers?

2 A. I do not.

3 Q. And you said Josh Harkins was a speaker?

4 A. Yes.

5 Q. And then there's this -- the -- the pastor
6 that spoke?

7 A. Yes, Reverend Rob Gill.

8 Q. Tell me a little bit about how the program
9 started. Y'all all came in and sat down, and then
10 what -- in your words, what happened?

11 A. Well, we filed in, and we sat down
12 according to -- they were separating those with
13 honors and those with high honors, based on your ACT
14 score. And once you separated through those groups,
15 you sat down alphabetically.

16 We were seated; we were introduced. I
17 think Lynn Weathersby said a few words, and then he
18 introduced the pastor who then stood up and had a
19 prayer to open up the ceremony. We were asked to
20 stand for the prayer and bow our heads. I did not.
21 After the prayer concluded, they introduced the next
22 speaker.

23 Q. Okay. And how did you feel during the
24 prayer?

25 A. Shocked, mildly humiliated. A lot of my

1 peers from Northwestern specifically knew of the
2 lawsuit, and they, themselves, were looking back as
3 if asking for clarification. Of course, we couldn't
4 speak. Incredibly startled.

5 I almost took out my phone to videotape
6 it. But there had been a videographer that was
7 introduced at the beginning to videotape it. They
8 said since the parents can't come, they would show
9 them that. And so I relied on the videographer's
10 footage instead. But I was humiliated and shocked.

11 Q. Now, you said -- did you stand or not
12 stand?

13 A. I stood. I did not bow my head.

14 Q. Okay. Did you -- what was going on in the
15 room? Could you tell with the other people, like
16 your peer students and the people on the podium or
17 the stage or --

18 A. Most everyone stood and bowed their heads.
19 As I mentioned before, a few of my peers looked back
20 at me, like, questioningly. Aside from that,
21 though, everything went as they ordered.

22 Q. Okay. Do you remember who was sitting
23 around you? Were you sitting with Faith, or were
24 you said it was alphabetical?

25 A. It was alphabetical. Faith was in the

M.B. - A Minor 12/16/2014

Page 15

1 other group of honorees. I don't know exactly who
2 was sitting around me. The program -- I know
3 there's photocopies of it somewhere that have the
4 order in which we were sitting, I believe.

5 Q. So you were sitting -- Northwest Rankin
6 sat together?

7 A. Yes.

8 Q. And there was the high honors?

9 A. And the honors.

10 Q. And the honors?

11 A. Yes.

12 Q. By school?

13 A. By school, yes, ma'am.

14 Q. Okay. Okay. You said they announced that
15 there was a videographer?

16 A. Yes, ma'am.

17 Q. Did you know beforehand -- had you seen
18 the program? Did you know anything about --

19 A. I had no idea.

20 Q. Okay.

21 A. No one had ever mentioned a prayer before
22 to me. I have friends and my brother who went
23 through it before. They never mentioned it. I had
24 no idea there would be a prayer.

25 Q. When was your brother --

M.B. - A Minor 12/16/2014

Page 16

1 A. My brother graduated May 2012, and his was
2 in April 2012.

3 Q. Got you. Is that your only brother?

4 A. I have two older brothers.

5 Q. Okay. That's what I thought, and you have
6 a younger --

7 A. Sister, yes.

8 Q. Okay. Now, do you know who was in charge
9 of the program?

10 A. I do not.

11 Q. Okay. There was no person that was
12 leading the group that you know of?

13 A. Not that I can recall.

14 Q. Okay. And you mentioned that at the time
15 of the thing, your principal was Charles Frazier?

16 A. Yes.

17 Q. Now, what role did he play in the
18 presentation or the --

19 A. Uh-huh. The principal sat on stage at
20 each school's roll call for them to, you know, call
21 the students up for their awards. He called
22 Northwest Rankin's.

23 Q. So he called the names out?

24 A. Yes.

25 Q. Okay. Did you walk across the stage? Get

1 an award, what --

2 A. Uh-huh.

3 Q. What did you get?

4 A. I walked across the stage. For honors,
5 you got a little medallion with a red ribbon. For
6 high honors, you got a blue ribbon with a medallion
7 on it. And you would walk across the stage, shake
8 the hands of your principal and Lynn Weathersby, and
9 they would give you medallion, and you would go back
10 and sit down.

11 Q. Okay. So each individual principal for
12 the schools was responsible for their own people?

13 A. Yes.

14 Q. Do you know -- do you have any knowledge
15 of what information about the program came to you
16 from Charles Frazier?

17 A. I do not. I have no idea if there was an
18 e-mail sent or if there was any -- or any
19 announcements. I don't know.

20 Q. Uh-huh. Did Charles Frazier participate
21 in the prayer?

22 A. He stood and bowed his head, yes.

23 Q. Do you know if he had any connection with
24 Rob Gill?

25 A. I do not.

1 Q. Do you know if he had anything to do with
2 Rob Gill delivering a prayer?

3 A. I do not.

4 Q. Specifically, as to Charles Frazier's
5 actions, how do you feel like he violated your
6 rights during that ceremony?

7 A. He allowed it to happen without saying
8 anything. He did not do anything to stop or
9 acknowledge the transgression, and he participated
10 by standing with the others.

11 Q. Do you know -- do you have any knowledge
12 if he knew what the program was going to be?

13 A. I don't know.

14 Q. And y'all were told there was a cameraman
15 there --

16 A. Yes.

17 Q. -- at the beginning?

18 A. At the very beginning.

19 Q. Okay. Just because your parents weren't
20 going to be there?

21 A. That was what they said. Lynn Weathersby
22 specifically, it's what he said.

23 Q. Okay. Now, you had said you had -- I'm
24 going to show you this. You had said that -- in
25 your affidavit, you had said that the school

M.B. - A Minor 12/16/2014

Page 19

1 officials issued a memo to students at Brandon High
2 School regarding the important events, and this was
3 one of them. And then it said -- right here, it
4 says, "On April" -- here it is. This was attached
5 to your thing. "On April 17th," it said that it --
6 they say "church attire." Where do I see that?
7 Right here (indicating). That the ceremony and
8 the -- you're to dress in church attire.

9 Now, this -- you went to Northwest Rankin
10 High School?

11 A. Yes.

12 Q. Where did this come from?

13 A. This information is generally publicly
14 available on the different websites for the schools.

15 Q. Okay. So each individual school had
16 instructions --

17 A. Yes.

18 Q. -- as to how -- what to wear? Did anybody
19 else say anything about church attire on their
20 website? Did you go look?

21 A. No, not that I know of. Easter -- I
22 looked at Northwest Rankin's. Easter Sunday,
23 however, does imply church attire, but I do not
24 recall it being on the website specifically.

25 Q. Okay.

1 A. Most of our information was given out via
2 the brochure that we have the printout or the
3 photocopy of and announcements and word of mouth.

4 Q. Got you. But what made you go look at one
5 on Brandon? I'm just curious.

6 A. That was the host school, and Brandon and
7 Northwest are both very, I guess, close together,
8 and I heard that they --

9 Q. Competitors?

10 A. Yeah. We are competitors, yes, in both
11 funds and sports. But -- and so I looked because I
12 thought if one was likely to kind of mimic
13 Northwest's actions, it would be Brandon.

14 Q. Okay. But you didn't look at any of the
15 other schools to see what they had said?

16 A. I did not.

17 Q. And do you have any other friends in any
18 of the other schools that --

19 A. I do not.

20 Q. -- said how they were told to dress?

21 A. No.

22 Q. Now, as far as anything on any website
23 about a prayer at the --

24 A. Uh-huh.

25 Q. -- did you find -- was there anything on a

1 website about prayer at this?

2 A. No, ma'am, not that I recall.

3 Q. And you had said there were some
4 pictures --

5 A. Yes.

6 Q. -- taken after the fact?

7 A. Yes, ma'am.

8 Q. Do you know who took those pictures?

9 A. It was one of our administrators because
10 it was within our high school gym. I should know.
11 I cannot recall.

12 Q. Those weren't taken at Brandon?

13 A. No, no. That was at our gym. We went
14 home via the school buses, and they had us line up
15 in the gym, and they took our pictures for the
16 website.

17 Q. And you said something on Twitter, also?
18 Did they put it on Twitter? Did y'all have a
19 Twitter account or was there one?

20 A. There is a Twitter account. I do not
21 recall if it was on Twitter. There are several
22 Twitter accounts for the different, you know,
23 functions of the school, like, Northwest Rankin
24 sports, Northwest Rankin --

25 Q. I just thought I had read something about

1 the Twitter account.

2 So were there pictures taken -- aside from
3 the camera guy, were there pictures taken at
4 Brandon?

5 A. Not that I know of. We weren't lined up
6 or anything at Brandon.

7 Q. Okay. And the significance of the -- you
8 had mentioned that in your Complaint, the
9 significance of the photos taken after the fact?

10 A. Uh-huh. It just -- it shows who was there
11 and who was present. Specifically, that I was
12 present at the awards ceremony. My name was
13 mentioned both on the brochure as well as you could
14 see in the pictures, which they knew I would be
15 there.

16 Q. About how many kids from Northwest Rankin
17 went?

18 A. Quite a lot, actually. I'm very proud of
19 that. Overall, I think there were about 300
20 students in attendance, and we had the most students
21 in attendance. I'm not quite sure how many there
22 were. I counted at one point for my own, like,
23 bragging rights. I can't remember exactly. I'm
24 sure there was close to a hundred.

25 Q. They weren't all in the picture, were

1 they, because I didn't think the picture had that
2 many -- were they all in one of these pictures?

3 A. Uh-huh, one of the two pictures.

4 Q. Okay. Okay.

5 A. Those present were in the -- some did
6 not -- some people did not show up.

7 Q. Okay. At all, the whole day?

8 A. I don't think they even went to school,
9 that was --

10 Q. Okay. And do you have any knowledge what
11 actual instructions came from actual school
12 district?

13 A. I do not know.

14 Q. Do you know if the school district was
15 responsible for planning the whole program?

16 A. On the brochure or the pamphlet they gave
17 us, it did say "Presented by RCSD."

18 Q. So you don't know --

19 A. I don't know for sure about that
20 information.

21 Q. Do you know from your brother's prior in
22 2012, was it a substantially similar program, or do
23 you know?

24 A. Well, I reviewed the videos of both, and
25 it looked very similar, yes.

1 Q. What, if any, conversation did you have
2 with Charles Frazier before the program?

3 A. None that I can recall.

4 Q. What about after the program?

5 A. None that I can recall.

6 Q. Did you ever have any conversation with
7 anybody at the school district about the -- what
8 transpired at the program?

9 A. No.

10 Q. And you didn't -- did you talk to any of
11 your teachers about how you felt after the program?

12 A. Yes. After the program, we had one class
13 left in the day, and I did go to class. It was
14 French class. And I mentioned briefly about what
15 happened and how frustrating it was. The teacher
16 did not -- she works for the district and didn't
17 respond.

18 Q. Who was the teacher of the French class?

19 A. Nancy Johnston.

20 Q. And nobody at -- nobody other than
21 Nancy Johnston at Northwest Rankin did you
22 express --

23 A. No, however, my peers expressed their
24 concerns to me, and as far as I know, they expressed
25 their concerns to our teachers. I'm not sure which

1 ones, but I knew by the time we reached school most
2 teachers already knew about it.

3 Q. Most of the --

4 A. At least in the Vine Street Annex, most of
5 the senior teachers --

6 Q. Wait, wait. In the what?

7 A. The Vine Street Annex. That's where my
8 last class of the day was. And so I knew several
9 teachers down that hall already knew what had
10 happened by the time we got back to school. Phones
11 are really great.

12 Q. Yeah. It's called the Vine Street Annex?

13 A. Yes, Vine Street Annex.

14 Q. And do you know if any teachers -- you
15 said Nancy Johnston didn't respond. Do you know if
16 anybody had any opinion --

17 A. I don't know.

18 Q. -- as to what happened?

19 A. I don't know.

20 Q. After the fact, you said -- I may have
21 asked you this, and I probably did. Did you ever
22 talk to Charles Frazier after the --

23 A. I did not.

24 Q. Anybody in the office at Northwest Rankin?

25 A. I did not.

M.B. - A Minor 12/16/2014

Page 26

1 Q. And aside from Ambrose --

2 A. I don't --

3 Q. -- you don't remember any --

4 A. I mean, I spoke to many peers afterwards,
5 but before discussing the attire, all I remember is
6 Faith being in one of the groups.

7 Q. Okay. But afterwards, you felt like there
8 was a thread across the people that were there?

9 A. Yes, many approached me, actually, after
10 the ceremony. We had a period after the ceremony
11 where they gave us Chick-fil-A, which was great.
12 But we had a period afterwards, and many of my peers
13 actually approached me.

14 And we -- most of my peers for my AP
15 government class or who had gone through AP
16 government because they now knew, like, court cases
17 citing about prayers in schools, and so they asked
18 me what are those court cases and asked what we
19 could do, if we could do anything. And I told them
20 I had already e-mailed my lawyer.

21 Q. So you had actually e-mailed your lawyer
22 before you left the --

23 A. I had e-mailed my lawyer as soon as we
24 stood up for the prayer. I had my phone out.

25 Q. Okay.

M.B. - A Minor 12/16/2014

Page 27

1 MS. WALL: Freddie, do you have anything?

2 MR. HARRELL: Just a couple of questions,
3 maybe just to follow-up.

4 EXAMINATION BY MR. HARRELL:

5 Q. Regarding what you wore that day --

6 A. Yes, sir.

7 Q. -- would it be fair to say that you were
8 thinking you should wear either a business attire or
9 an Easter-type attire?

10 A. Well, I definitely wore business. I had
11 heard Easter was what everyone else was going to
12 wear, but as the black sheep that I am, and I really
13 enjoy dressing in business, I wore a complete
14 business, pencil skirt and blazer.

15 Q. What is the difference in these two? I'm
16 not sure I understand it.

17 A. Well, Easter Sunday, or you compare to,
18 like, sundresses. They're pretty dresses, not
19 professional but pretty, something you wear to
20 church. Whereas, business professional would be
21 slacks, panty hose, pencil skirt, blazer, sports
22 coats. For example, the Easter Sunday, khakis for
23 men would be appropriate with a button up -- a nice
24 button up shirt and tie; whereas, if you're doing
25 business, it would be more appropriate to wear black

1 slacks with a sports coat.

2 Q. Would it be fair to say that it was your
3 interpretation from the administration's request
4 that everyone wear nice clothes --

5 A. Yes.

6 Q. -- to this event?

7 A. Yes.

8 Q. And when you got the -- the message that
9 y'all could wear business attire or church attire or
10 nice clothes attire, did you take that as a -- as a
11 signal that there would be a church activity at the
12 school?

13 A. I did not.

14 Q. Okay.

15 A. In the South, a lot of people refer to
16 nice dress as church attire or Easter Sunday if it's
17 casual but still a -- go to a nice event.

18 Q. Exactly. Okay. And then on Dr. Frazier,
19 as regards Dr. Frazier, would you tell the Court
20 what you know of specifically he had to do with the
21 planning of this event and, in particular, the
22 planning of the prayer that you mentioned?

23 A. I don't know what hand he had in the
24 planning.

25 Q. Okay. Do you know if he had any -- any

M.B. - A Minor 12/16/2014

Page 29

1 hand at all?

2 A. I don't know.

3 Q. Okay. You had no knowledge that he had
4 any -- any authority regarding the planning of that
5 event?

6 A. No, sir, I'm only aware that he attended.

7 MR. HARRELL: Okay. That's all.

8 EXAMINATION BY MS. WALL:

9 Q. A couple of follow-ups. Who do you feel
10 like the day -- who was the person on the podium
11 that you felt like was in charge?

12 A. Well, Lynn Weathersby was up there the
13 most, and he was leading most of the introductions
14 and whatnot. I'm not sure if he led the planning,
15 but he led a lot of the introductions.

16 Q. Who -- I believe the tape I've seen
17 doesn't tell you who started the program. Do you
18 know who -- who was the first person to speak?

19 A. If I can recall, it was Lynn Weathersby.

20 Q. And he did the closing remarks also?

21 A. Yes.

22 Q. Okay. And one quick question: Do you
23 know what, if any -- or what the relationship is
24 between the Rankin County School District and
25 Rob Gill?

M.B. - A Minor 12/16/2014

Page 30

1 A. I do not know.

2 Q. Do you know how or why he was selected?

3 A. I have no idea. I think he's from a
4 member of a local church, but I am not sure at all.
5 I know he's Methodist.

6 Q. And you don't know who invited him to
7 speak?

8 A. No, ma'am.

9 Q. Do you know who invited Josh Harkins to
10 speak?

11 A. No, ma'am.

12 MS. WALL: That's pretty much all I've
13 got.

14 (Time Noted: 11:42 a.m.)

15 SIGNATURE/NOT WAIVED

16

17 ORIGINAL: LYNN CHAIN WALL, ESQ.

18 COPY: FRED M. HARRELL, JR., ESQ.

19 COPY: RITA NAHLIK SILIN, ESQ.

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DATE: December 16, 2014

ORIGINAL TO: LYNN CHAIN WALL, Esq.

Subject to those corrections listed below,
9 if any, I find the transcript to be the correct
testimony I gave at the aforesated time and place.

17
18 This the day of , 2015.

20 State of Mississippi
County of

23 My Commission Expires:

Meridian
New Orleans

M.B. - A Minor 12/16/2014

Page 32

1 CERTIFICATE OF COURT REPORTER

2 I, Ginger H. Brooks, Court Reporter and
3 Notary Public, in and for the State of Mississippi,
4 hereby certify that the foregoing contains a true
5 and correct transcript of the testimony of M.B., A
6 MINOR, as taken by me in the aforementioned matter
7 at the time and place heretofore stated, as taken by
8 stenotype and later reduced to typewritten form
9 under my supervision by means of computer-aided
10 transcription.

11 I further certify that under the authority
12 vested in me by the State of Mississippi that the
13 witness was placed under oath by me to truthfully
14 answer all questions in the matter.

15 I further certify that I am not in the
16 employ of or related to any party in this matter and
17 have no interest, monetary or otherwise, in the
18 final outcome of this matter.

19 Witness my signature and seal this the 2nd
20 day of January, 2015.

21

22

23

24

My Commission Expires:
25 September 18, 2017

GINGER H. BROOKS
CRR, RPR, CCR